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EG&G ROCKY FLATS

INTEROFFICE CORRESPONDENCE

DATE: August 24, 1994

TO: A. A. Church, Waste Regulatory Programs, Bldg. T130C, X7825

FROM: M. C. Broussard, Environmental Operations Management, Bldg. 080, X8517

SUBJECT: RELEASE AVOIDANCE INITIATIVE - MCB-233-94

Ref: T. G. Hedahl ltr (94-RF-08108), to J. C. Leifer, Release Avoidance Initiative, July 27, 1994 (Attachment 1)

T. G. Hedahl ltr, TGH-341-94), Release Avoidance Initiative, August 10, 1994

DOE Order: 5480.4

Action: None required.

The information provided on Attachment 2 of your letter dated August 10, 1994 refers to three spill incidents listed under S. G. Stiger's organization. See attachment for corrections required on the summary log. In addition, Environmental Operations Management has reviewed the criteria identified in the above referenced memo and evaluated the possibility of establishing a plan for a spill response initiative. Additional information regarding these spills is given below.

Building 891 Acid Tank - In December of 1992 a spill of 2200 gallons of Hydrochloric acid occurred at Building 891. This occurred at the conclusion of a transfer of acid from a tanker truck to the acid tank inside the building. Acid began discharging from the overflow line of the tank as the tanker was blowing down the lines. The overflow created a siphon effect created in an incorrectly piped overflow line. The problem was corrected and several acid transfers have been performed without difficulty since this occurrence. A plantsite review of tank configurations was performed by the Engineering Department in order to ensure that a similar problem would not occur at another location.

OU2 FTU Diesel and Oil Spills - Several spills occurred during the refueling, service, and operation of generators used to power the Field Treatment Unit. Environmental Restoration Program Division (ERPD) considers it best management practice to have secondary containment for all generators in use. However, in at least one instance the secondary containment was inadequate for all possible circumstances. Seconday containment was in place under the fuel storage tank, however, the containment was not adequate to prevent a spill from the diesel engine oil reservoir. Overhead permanent power has since been installed at both the Field Treatability Unit and the Soil Vapor Extraction Unit and generators are not in use at this time.

OU-2 Influent Line Breaks - A number of influent line breaks occurred at the OU2 Treatment Facility. Funding for an initiative to replace the influent line was not approved and the line remains in place. The leak detection system will be upgraded however, to provide warning of any possible future line breaks.

Although investigations to these systems have been conducted, an action plan targeting all ERPD projects/areas would be appropriate to prevent future avoidable spills. Areas to be addressed in the action plan may include a review of tank systems, adequate secondary containment for generators and fluid transfer processes, proper spill response, and leak detection systems on permanent fluid transfer lines. An action plan targeting these areas will be completed and forwarded to Waste Management by September 14, 1994.

If you have any questions, please contact J. R. Cirillo of my staff on extension 5876.

JRC:la

Attachment:
As Stated (1)

cc:
M. C. Burmeister
L. A. Gregory-Frost
S. L. Myrick
S. G. Stiger
ERM Records Center (2)

	883	1	A-26	One release on 5/25/94 of 2 gal
S. Stiger	891	N/A	HCl	One release of 2200 gal on 12/21/92
R. Fray	910	101	Varied	Six releases from 9/93 through 3/94 involving D-50, sump, and system
* S. Stiger	OU-2	N/A	Unknown	3 releases from 3/93 thru 4/94 involving the influent line
* S. Stiger	OU-2	N/A	N/A	5 releases from 11/93 to 6/94. Misc. fuel & oil resulted from maintaining the generators.
R. Fray	VV-16	N/A	N/A	One release on 11/9/93 of condensate from the Steam Plant